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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

WEALTHY INC. and DALE  
BUCZKOWSKI,

Plaintiffs,  
v.

SPENCER CORNELIA, CORNELIA  
MEDIA LLC, and CORNELIA  
EDUCATION LLC,

Defendants.

Case No.: 2:21-cv-01173-JCM-EJY

**STIPULATION TO EXTEND TIME AS  
TO THE RESPONSE TO DEFENDANTS  
JOHN MULVEHILL AND JOHN  
ANTHONY LIFESTYLE, LLC'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT  
AND SPECIAL MOTION TO DISMISS  
PURSUANT TO NRS 41.660 AND  
OPTIMIZED LIFESTYLE, LLC'S  
JOINDER TO DEFENDANTS JOHN  
MULVEHILL AND JOHN ANTHONY  
LIFESTYLE, LLC'S SPECIAL MOTION  
TO DISMISS PURSUANT TO NRS 41.660**

**(FIRST REQUEST)**

Consolidated With:  
Case No.: 2:22-cv-00740-JCM-EJY

WEALTHY INC. and DALE  
BUCZKOWSKI,

Plaintiffs,  
v.

JOHN MULVEHILL, JOHN ANTHONY  
LIFESTYLE, LLC, and OPTIMIZED  
LIFESTYLE LLC

Defendants.

Plaintiffs Wealthy Inc. and Dale Buczkowski ("Plaintiffs"), by and through their counsel of record, Peterson Baker PLLC and Culhane Meadows PLLC, Defendants John Mulvehill ("Mr. Mulvehill"), John Anthony Lifestyle, LLC ("JAL"), by and through their counsel of record, Kravitz Schnitzer Johnson & Watson, Chtd., Optimized Lifestyle, LLC ("OL"), by and through their counsel of record, Howard & Howard Attorneys, PLLC, and Spencer Cornelia, Cornelia Media, LLC, and Cornelia Education, LLC, by and through their counsel of record, Randazza Legal Group, PLLC, hereby submit this stipulation and order to extend the time for Plaintiffs to file their response to Defendants John Mulvehill and John Anthony Lifestyle, LLC's Motion for Partial Summary Judgment and Special Motion to Dismiss Pursuant to NRS 41.660 [ECF No. 178] ("Special Motion to Dismiss") and Optimized Lifestyle, LLC's Joinder to Defendants John Mulvehill and John Anthony Lifestyle, LLC's Special Motion to Dismiss Pursuant to NRS 41.660 [ECF No. 183] pursuant to LR IA 6-1. This is the first stipulation for an extension of time to respond to the Special Motion to Dismiss and the first stipulation for an extension of time to respond to OL's Joinder to Defendants John Mulvehill and John Anthony Lifestyle, LLC's Special Motion to Dismiss Pursuant to NRS 41.660.

1. Mr. Mulvehill and JAL filed their Special Motion to Dismiss on March 17, 2023. The document was filed twice in order to comply with LR IC 2-2(b), and the motions were docketed as two separate docket entries, a Motion to Dismiss [ECF No. 178], and a Motion for Summary Judgment [ECF No. 171].<sup>1</sup>

2. OL filed its Joinder to Defendants John Mulvehill and John Anthony Lifestyle, LLC's Special Motion to Dismiss Pursuant to NRS 41.660 [ECF No. 183] on March 20, 2023.

3. Pursuant to LR 7-2, the deadline to file and serve any response to a motion for summary judgment is 21 days after service of the motion. The deadline to file and serve a response to a motion to dismiss is 14 days after service of the motion.

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<sup>1</sup> The motion was filed a third time as ECF No. 179, but the third filing was docketed as a "Motion to Correct." Defendants Mr. Mulvehill and JAL filed a Notice of Errata [ECF No. 180] explaining the reason for their filing of ECF No. 179.

4. Because both motions have overlapping facts and argument, to avoid ambiguity and to promote the just, speedy, and inexpensive determination of the pending motions as docketed, the parties agree, subject to the Court's approval, that the deadline to file the response to the Motion to Dismiss [ECF No. 178] and any response to the Joinder [ECF No. 183] shall be extended to and including April 7, 2023, which is the same due date as the response to the Motion for Summary Judgment [ECF No. 171].

5. Additionally, to avoid ambiguity as to the page limit requirements under LR 7-3, the parties agree, subject to the Court's approval, that the page limit of the omnibus response to the Motion to Dismiss [ECF No. 178], the Motion for Summary Judgment [ECF No. 171], and the Joinder [ECF No. 183] shall be 30 pages, excluding exhibits, which is equivalent to the page limit requirements of a response to a motion for summary judgment.

IT IS SO STIPULATED.

Dated this 24th day of March, 2023.

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Dated this 24th day of March, 2023.

Dated this 24th day of March, 2023.

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and Cornelia Education LLC*

IT IS SO ORDERED.

  
U.S. DISTRICT COURT JUDGE

Dated: March 27, 2023